

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

GENERAL ACCESS SOLUTIONS, LTD.,

Plaintiff,

v.

CELLCO PARTNERSHIP D/B/A VERIZON
WIRELESS, VERIZON SERVICES CORP.,
VERIZON BUSINESS GLOBAL LLC,
VERIZON BUSINESS NETWORK
SERVICES LLC, VERIZON CORPORATE
SERVICES GROUP INC., VERIZON DATA
SERVICES LLC, and VERIZON ONLINE
LLC,

Defendants,

ERICSSON, INC.,

Intervenor-Defendant.

C.A. No. 2:22-394-JRG

JURY TRIAL DEMANDED

DEFENDANTS' NOTICE PURSUANT TO 35 U.S.C. § 282

Pursuant to 35 U.S.C. § 282(c), Defendants Cellco Partnership d/b/a Verizon Wireless, Verizon Services Corp., Verizon Business Global LLC, Verizon Business Network Services LLC, Verizon Corporate Services Group Inc., Verizon Data Services LLC, and Verizon Online LLC (collectively, “Verizon”) and Intervenor-Defendant Ericsson, Inc. (“Ericsson”) provide this notice (the “Section 282 Notice”) to Plaintiff General Access Solutions, Ltd. of patents, publications, other prior art, and witnesses upon which Verizon and Ericsson may rely to establish the invalidity and the state of the art as to U.S. Patent Nos. 7,230,931 (the “’931 patent”) and 9,426,794 (the “’794 patent”) (together, the “Asserted Patents”).

Verizon and Ericsson have already provided the requisite notice through the pleadings and documents filed or served over the course of this litigation, including but not limited to its answer to the complaint, initial disclosures, invalidity contentions, expert reports, discovery responses, fact and expert depositions, trial exhibit lists, trial witness lists, and all documents cited or relied upon therein (collectively, the “Prior Notice”). These pleadings and documents comprising the Prior Notice include the information that Section 282 requires with respect to the patents, publications, other prior art, and witnesses upon which Verizon and Ericsson intend to rely to establish the invalidity and the state of the art as to the asserted claims of the Asserted Patents. Verizon and Ericsson therefore incorporate by reference that Prior Notice into this Section 282 Notice as if fully set forth herein. For the same reason, Verizon and Ericsson incorporate by reference into this Section 282 Notice all prior art cited or otherwise contained in the prosecution records of the applications that issued as the Asserted Patents, as well as any related applications that were filed in the United States or world.

In addition, Verizon and Ericsson identify the following patents, publications, other prior art, and trial witnesses who may testify in connection with Verizon and Ericsson’s contentions as to invalidity of the Asserted Patents.

I. Prior Art

A. Patents, Patent Publications, or Patent Applications

Country	Patent / Publication / Application No.	Date Filed / Published / Issued	Name of Patentee / Applicant
U.S.	U.S. Patent No. 5,838,674	November 17, 1998	Forssén
U.S.	U.S. Patent Publication No. 2002/0021684	February 21, 2002	Toshimitsu
U.S.	U.S. Patent No. 10,820,312	October 27, 2020	Struhsaker
U.S.	U.S. Patent No. 9,379,916	June 28, 2016	Struhsaker
U.S.	U.S. Patent No. 6,094,421	January 21, 1997	Scott
U.S.	U.S. Patent No. 6,470,177	October 22, 2002	Andersson et al.
U.S.	U.S. Patent No. 7,366,133	April 29, 2008	Ahy

Country	Patent / Publication / Application No.	Date Filed / Published / Issued	Name of Patentee / Applicant
U.S.	U.S. Provisional App. No. 60/262,698	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,708	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,712	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,824	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,825	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,826	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,827	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,951	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/262,955	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/263,097	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/263,101	January 19, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/270,378	February 21, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/270,385	February 21, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/270,430	March 5, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/273,579	March 5, 2001	Struhsaker
U.S.	U.S. Provisional App. No. 60/273,757	March 5, 2001	Struhsaker
U.S.	U.S. Patent Appl. No. 11/982,424	October 31, 2007	Struhsaker
U.S.	U.S. Patent Appl. No. 09/839,499	April 20, 2001	Struhsaker
U.S.	U.S. Patent No. 7,346,347	March 18, 2008	Struhsaker
U.S.	U.S. Patent No. 6,374,078	April 16, 2002	Williams
U.S.	U.S. Patent Appl. No. 13/567,978	August 6, 2012	Struhsaker
U.S.	U.S. Patent No. 9,225,555	December 29, 2015	Struhsaker
U.S.	U.S. Patent No. 6,122,260	September 19, 2000	Liu
U.S.	U.S. Patent No. 6,496,535	December 17, 2002	Xu

Country	Patent / Publication / Application No.	Date Filed / Published / Issued	Name of Patentee / Applicant
U.S.	U.S. Patent No. 6,304,560	October 16, 2001	Archambaud

B. Other Prior Art

System, Publication, or Other Document	Bates Beg	Bates End
Navini Ripwave System	n/a	n/a
MobileStar System	n/a	n/a
IEEE 802.11 (1999)	VZNGAS1004777	VZNGAS1005304
IEEE 802.11a (1999)	VZNGAS1005305	VZNGAS1005394
IEEE 802.11b (1999)	VZNGAS1005395	VZNGAS1005490
“Performance analysis of an adaptive OFDM packet data system,” Proceedings of the 2000 International Zurich Seminar on Broadband Communications, February 15–17, 2000 (“Baum”)		
11/1999 U. Vornfeld et al., SDMA Techniques for Wireless ATM, IEEE Communications Magazine 52 (“Vornfeld”) ¹	VZNGAS0002232	VZNGAS0002237
SkyFire Beam Forming/Smart Antenna White Paper	GA0014070	GA0014074
AT&T_RAZE_Tech_081902.ppt	GA0014998	GA0015055
Raze Technologies – Electronic Assembly Manufacturer Qualification Profile Template	GA0000393	GA0000408
Raze Technologies – MMDS and UNII Antenna Specifications (Raze PN: 11-00000145)	GA0006246	GA0006256
Raze Technologies – SkyFire System & Advanced Processing Overview	GA0002404	GA0002408
Response to Clearwire Technologies’ Request for Information For Fixed Broadband Wireless Access Systems Operating in the ITFS/MMDS Frequency Band	GA0004639	GA0004735

¹ Per with the *Sotera* stipulation in connection with IPR2023-00978, Verizon (and Ericsson) will not rely on Vornfeld to prove that the ’931 Patent is invalid as obvious. However, Verizon and Ericsson reserve the right to rely on Vornfeld to the extent necessary to establish the state of the art relevant to their other invalidity defenses or ineligibility contentions.

System, Publication, or Other Document	Bates Beg	Bates End
WestEnd BroadBand – Air Interface Specification	GA0005411	GA0005498
WestEndBroadBand – Business Plan ...Bandwidth changes everything	GA0087213	GA0087272
WestEndBroadBand – Air Interface Specification	GA0133336	GA0133423
Raze Technologies – Unlicensed Informational Infrastructure Band Radio Specification 1/2/2001	GA0007976	GA0008003
Raze Technologies - Paul Struhsaker Weekly Report 3/23/2001	GA0003374	GA0003374
IEEE 802.16.3c-01/31r1 (March 6, 2001)	GA0004868	GA0004892
Arunabha Ghosh, Jun Zhang, Jeffrey G. Andrews, and Rias Muhamed, Fundamentals of LTE, (Pearson Education, 2010)	VZNGAS_003001920	VZNGAS_003002308
https://www.3gpp.org/dynareport/Meetings-R1.htm (last accessed Feb. 6, 2024)		
https://www.3gpp.org/specifications-groups/specifications-groups (last accessed Feb. 6, 2024)		
http://www.3gpp.org/technologies/keywords-acronyms/104-w-cdma (last accessed January 18, 2020)	VZNGAS_003001901	VZNGAS_003001902
http://www.3gpp.org/technologies/keywords-acronyms/104-w-cdma (last accessed January 18, 2020)		
https://www.ieee802.org/16/tgl/index.html	VZNGAS_003002308	VZNGAS_003002312
https://ieee802.org/16/arc/802-16list2/msg00338.html	VZNGAS_003002385	VZNGAS_003002386
https://www.ieee802.org/16/tge/index.html	VZNGAS_003002313	VZNGAS_003002384
Jeffrey G. Andrews, Arunabha Ghosh, and Rias Muhamed, Fundamentals of WiMAX Understanding broadband wireless networking, (Pearson Education 2007)	VZNGAS_003001430	VZNGAS_003001900

System, Publication, or Other Document	Bates Beg	Bates End
R1-051290, R1-051568, R1-060755, R1-061099, R1-061641, R1-062448, R1-063013, R1-063613, R1-070633, R1-071245w, R1-071768, R1-072001, R1-072646, R1-073815, R1-073896		
LTE Rel 8 2009		
LTE Rel 10 2011		
LTE Rel 11 2013		
LTE Rel 13 2016		
What Will 5G Be?, Jeffrey G. Andrews, Stefano Buzzi, Wan Choi, Stephen Hanly, Angel Lozano, Anthony C.K. Soong, Jianzhong Charlie Zhang, IEEE JSAC Special Issue on 5G Wireless Communication Systems, pp. 1-6, May 12, 2014	VZNGAS_003001903	VZNGAS_003001919
The History of WiFi, https://getvoip.com/history-of-wifi/	VZNGAS0003182	VZNGAS0003216
“Definitions,” 1999 MobileStar Web Archive	VZNGAS0000455	VZNGAS0000455
Navini 3/9/01 Presentation	GRABNER0000174	GRABNER0000268
Navini Ripwave CPE Pictures	GRABNER0000353	GRABNER0000355
SuperComm Tradeshow Pictures	GRABNER0000356	GRABNER0000359
Sprint Trial Picture	GRABNER0000360	GRABNER0000360
Navini CPE Picture	GRABNER0000173	GRABNER0000173
SuperComm Trip Report	GA0053007	GA0053011
SuperComm Article	VZNGAS_003000336	VZNGAS_003000337
Product Trial Results	GRABNER0000002	GRABNER0000086
Telecom Trends Article	GA0054347	GA0054374
Ripwave Base Station (RBS)	GRABNER0000001	GRABNER0000001
Theodore S. Rappaport, WIRELESS COMMUNICATIONS: PRINCIPLES AND PRACTICE, ch. 8 (2d ed. 1996)	VZNGAS_003002406	
Technology Architecture Product Sprint Trial	GRABNER0000269	GRABNER0000351
Adaptive Antennas for GSM and TDMA Systems by Soren Anderson, Bo Hagerman, Henrik	ERICSSON-GAS(VZ)00076575	ERICSSON-GAS(VZ)00076587

System, Publication, or Other Document	Bates Beg	Bates End
Dam, Ulf Forssen, Jonas Karlsson, Fredric Kronestedt, and Sara Mazur		
Adaptive Antennas in Frequency Hopping GSM by Fredric Kronestedt and Soren Andersson	ERICSSON-GAS(VZ)00076565	ERICSSON-GAS(VZ)00076569
Adaptive Antenna Arrays for GSM900/DCS1800 by Ulf Forssen, Jonas Karlsson, Bjorn Johannisson, Magnus Almgren, Fredrik Lotse and Fredric Kronestedt	ERICSSON-GAS(VZ)00076555	ERICSSON-GAS(VZ)00076559
Antenna Arrays for TDMA Personal Communication Systems by Ulf Forssen, Fredric Kronestedt, Jonas Karlsson, Magnus Almgren, and Soren Anderson	ERICSSON-GAS(VZ)00076570	ERICSSON-GAS(VZ)00076574
Migration of Adaptive Antennas Into Existing Networks by Fredric Kronestedt and Soren Andersson	ERICSSON-GAS(VZ)00076560	ERICSSON-GAS(VZ)00076564
Radio Network Performance for Indoor Cellular System by Fredric Kronestedt, Manus Frodigh, Kenneth Wallstedt	ERICSSON-GAS(VZ)00076550	ERICSSON-GAS(VZ)00076554
Hesse, B., RBS 2000 – The new generation of GSM 900, DCS 1800 and PCS 1900 radio base stations, 73 ERICSSON REVIEW 136, No. 4 1996 at 138 (1996), https://www.ericsson.com/4ac5c2/assets/local/about-ericsson/ericsson-history/lmreview/documents/da2011-35597-ericsson review vol 73 1996.pdf	ERICSSON-GAS(VZ)01051483	ERICSSON-GAS(VZ)1051670
Reissue Application Declaration By the Assignee	ERICSSON-GAS(VZ)01035988	ERICSSON-GAS(VZ)01035991
Attorney Docket No. WEST14-00148: In the Claims:...	ERICSSON-GAS(VZ)01035995	ERICSSON-GAS(VZ)01036002
Attorney Docket No. WEST14-00148: In the Claims:...	ERICSSON-GAS(VZ)01036153	ERICSSON-GAS(VZ)01036160
Office Action Summary – Applicant: P. Struhsaker	ERICSSON-GAS(VZ)01036027	ERICSSON-GAS(VZ)01036052
Ericsson Internal Implementation Description 11.22.2023	ERICSSON-GAS(VZ)01035364	ERICSSON-GAS(VZ)01035546
Competitive Analysis	GA0057088	GA0057125
Raze Presentation	GA0014998	GA0015055

System, Publication, or Other Document	Bates Beg	Bates End
802.16.3 Full IEEE Interim Session March 11-15 2002	GA0134463	GA0134467
802.16a IEEE Interim meeting notes	GA0135310	GA0135315
Follow on Standards Activities for IEEE 802.16a	GA0043602	GA0043604
Clearwire RFI Response	GA0004639	GA0004735
Alamouti, S. M. 1998. "A simple transmit diversity scheme for wireless communications."	VZNGAS1009674	VZNGAS1009681
P. W. Wolniansky, G. J. Foschini, G. D. Golden and R. A. Valenzuela, "V-BLAST: An Architecture for Realizing Very High Data Rates Over the Rich-Scattering Wireless Channel," 1998 URSI Int'l Symposium on Signals, Systems, and Electronics	VZNGAS_003003046	VZNGAS_003003051
IEEE 802.16.3c-01/31r1	GA0004868	GA0004937
802.16a Enhancement Ad Hoc Report 11 July 2002	GA0043582	GA0043585
SkyBeam Paper	GA0014070	GA0014098
802.16.3 Full IEEE Interim Session March 11-15 2002	GA0134463	GA0134467
Raze Device Photo	GA0117792	GA0117792
Raze Roadshow Slides	GA0037389	GA0037393
March 23, 2001 Weekly Report	GA0003374	GA0003374
February 23, 2002 Weekly Report	GA0039969	GA0039969
March 23, 2002 Weekly Report	GA0040066	GA0040067
April 26, 2002 Weekly Report	GA0014775	GA0014775
Raze Technologies - Statement of Work For Antron, Inc.	GA0014343	GA0014346
Multi-Beam Antenna Development Status Report January 2002	GA0014349	GA0014351
RFM Digital Hardware Verification To Do List 06/26/2002	GA0065290	GA0065294
Weekly Report – Kirk Griffin 03/30/2001; 07/27/2001; 09/21/2001; 11/09/2001	GA0014246, GA0003965, GA0004286, GA0004591	GA0014247; GA0003966; GA0004287; GA0004599
MobileStar Internet Archive	VZNGAS0000434	VZNGAS0000434
MobileStar Internet Archive	VZNGAS0000436	VZNGAS0000437

System, Publication, or Other Document	Bates Beg	Bates End
MobileStar Internet Archive	VZNGAS0000441	VZNGAS0000441
MobileStar Internet Archive	VZNGAS0000439	VZNGAS0000439
Information week, "Clear signals for wireless LANs," Oct. 11, 1999	VZNGAS_003000005	VZNGAS_003000008
Business Wire "MobileStar Network Adds 50th Public Access Hotel," Nov. 8, 1998	VZNGAS_003000046	VZNGAS_003000047
WSJ Article	VZNGAS0000044	VZNGAS0000046
Dallas Morning News, "Texas Firm Installing Wireless Internet Service in 3,000 Starbucks Cafes" Feb. 20, 2001	VZNGAS_003000247	VZNGAS_003000248
Marketing Computers, "MobileStar to Land in Starbucks," Mar. 2001	VZNGAS_003000209	VZNGAS_003000210
The Wall Street Journal, "IBM to Install MobileStar Access Points," Apr. 12, 2001	VZNGAS_003000175	VZNGAS_003000175
Network's Broadband Wireless Internet Service To the Test at Vortex 2000 Conference," May 24, 2000	VZNGAS_003000176	VZNGAS_003000176
American Airlines Agreement dated Apr. 17, 1998	MSGAS_0002274	MSGAS_0002291
Hilton Agreement dated Oct. 8, 1998	MSGAS_0002292	MSGAS_0002316
American Airlines Letter of Intent dated Jan. 27, 1998	MSGAS_0002317	MSGAS_0002321
SABRE Group Agreement dated Dec. 31, 1997	MSGAS_0002322	MSGAS_0002354
Sheraton Agreement dated Feb. 1, 1998	MSGAS_0002355	MSGAS_0002374
Holiday Hospitality Pre-Commercial Service PAL Agreement dated Apr. 7, 1998	MSGAS_0002375	MSGAS_0002383
Starbucks Master Agreement dated Dec. 20, 2000	MSGAS_0002384	MSGAS_0002459
March 9, 2001 Weekly Report	GA0041218	GA0041221
Presentation to IBM Technology Board dated May 31, 2000	MSGAS_0000192	MSGAS_0000258
Brenner 1996	VZNGAS0002621	VZNGAS0002644
MobileStar Business Diaries	MSGAS_0000377	MSGAS_0002273
Mobile Star Service and Opportunity Description	MSGAS_0000167	MSGAS_0000183

System, Publication, or Other Document	Bates Beg	Bates End
ARINC Press Release dated July 20, 2000	MSGAS_0000001	MSGAS_0000003
August 2000 Press Release	MSGAS_0000053	MSGAS_0000054
Mobile Star Service and Opportunity Description	MSGAS_0000167	MSGAS_0000183
MobileStar Summary	MSGAS_0000259	MSGAS_0000333
1998 Internet Archive, "What is the MobileStar Network?"	VZNGAS0000442	VZNGAS0000453
Foschini 1998	VZNGAS_003003046	VZNGAS_003003051
Raze Two-Tier Architecture White Paper	GA0040938	GA0040955

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* * *

Verizon and Ericsson reserve the right to supplement or to modify this Section 282 Notice through and including the time of trial.

Dated: May 24, 2024

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CERTIFICATE OF SERVICE

I hereby certify that on May 24, 2024, the foregoing was served upon all counsel of record who have consented to electronic service.

/s/ Katherine Q. Dominguez
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